

JMK:RCH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

HILLARY SHEPHERD,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JONATHAN PAPLOW, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about August 10, 2015, within the Eastern District of New York and elsewhere, the defendant HILLARY SHEPHERD, did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent’s information and belief are as follows:¹

1. On or about August 10, 2015, the defendant HILLARY SHEPHERD, a citizen of Guyana, arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York aboard Caribbean Airlines Flight 524 from Port of Spain, Trinidad.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented a black “BME” suitcase and a black carry-on roller suitcase for inspection.


3. A search of the black “BME” suitcase revealed that it contained, among other things, two large plastic bottles. Further inspection of the two large plastic bottles revealed that each contained many small black plastic packages. A CBP officer probed one of the small black plastic packages, revealing a white powdery substance that field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine recovered was 3,301.2 grams.

5. After he was placed under arrest, the defendant was read his Miranda rights, which he stated he understood and voluntarily waived. The defendant then stated in sum and substance and in part that: (a) he knew that he had drugs in his suitcase, although he was not certain which type of drug he possessed; and (b) he expected to be paid approximately \$10,000 in exchange for transporting the drugs into the United States.

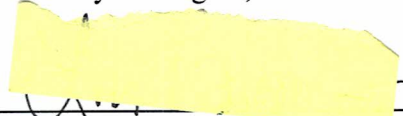
WHEREFORE, your deponent respectfully requests that the defendant HILLARY SHEPHERD be dealt with according to law.

Dated: Brooklyn, New York
August 11, 2015



JONATHAN PAPLOW
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
11th day of August, 2015



THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK